

## A.5 Inspection Schedule

MICHIGAN DISPOSAL WASTE TREATMENT PLANT (MDWTP)  
MID 000 724 831  
2016 PERMIT APPLICATION

**FORM EQP 5111 ATTACHMENT TEMPLATE A5  
INSPECTION REQUIREMENTS**

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, R 299.9605 and Title 40 of the Code of Federal Regulations (CFR) §§264.15 and 270.14(b)(5), establish requirements for inspections at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for inspections at the following hazardous waste management facility: Michigan Disposal Waste Treatment Plant in Belleville, Michigan.  
(Check as appropriate)

- Applicant for Operating License for Existing Facility
- Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

## Table of Contents

INTRODUCTION .....	3
A5.A WRITTEN SCHEUDLE .....	3
A5.A.1 Types of Problems .....	3
A5.A.2 Frequency of Inspection.....	3
A5.B REMEDY SCHEUDLE .....	5
A5.C INSPECTION LOG OR SUMMARY .....	5

## INTRODUCTION

[R 299.9605 and 40 CFR §264.15(a)]

The facility is inspected for malfunctions and deterioration, operator errors, and discharges that may be causing, or may lead to: (1) release of hazardous waste constituents into the environment or (2) a threat to human health. The owner or operator must conduct these inspection often enough to identify problems in time to correct them before they harm human health or the environment

### A5.A WRITTEN SCHEDULE

[R 299.9605 and 40 CFR §264.15(b)(1)]

The inspection schedule has been developed in accordance with the requirements outlined in 40CFR 264.195, 264.174 and 264.15, and is kept at the facility as part of the operating record.

Inspections have been developed for the following items in order to identify problems in time to correct them before they harm human health or the environment:

- 1) Monitoring equipment
- 2) Safety and emergency equipment
- 3) Security devices; and
- 4) Operating and structural equipment important to preventing, detecting, or responding to environmental or human health hazards.

#### A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

##### *Container Storage Areas*

Container storage areas are inspected for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors

##### *Tanks*

Tank systems are inspected for the following items.

- Evidence of corrosion or release of waste from above ground tank system
- Erosion or evidence of a release in secondary containment systems
- Malfunctions in ancillary equipment without secondary containment has not had a release to the environment

##### *Emergency Equipment*

Are inspected to ensure proper operation in the event of an emergency.

#### A5.A.2 Frequency of Inspection

[R 299.9605 and 40 CFR §§264.15(b)(4), 264.174, 264.193, 264.195 and 264.1084, 264.1086, 264.1089]

The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, or malfunction, or any operator error goes undetected between inspections, and considers the tank and container storage inspection requirements outlined in 40 CFR 264.195 and 264.174.

### ***Container Storage Areas***

In accordance with the requirements set forth in 40 CFR 264.174, 264.1086 containers will be inspected weekly. On days when containers are added to or removed from a storage area and/or that the truck dock is used, that storage area and/or truck dock area will be inspected daily in accordance with 40 CFR 264.15(b)(4). The following will be inspected:

- Integrity/closure of the containers
- Evidence of a release
- Containment base is free of cracks or gaps
- Liquids have been removed from the containment system within 24 hours of detection and solids have been removed within 60 days of detection.

### ***Tanks***

In accordance with the requirements set forth in 40 CFR 264.193, 264.195, 264.1084 tank system components will be inspected as follows:

*Once each operating day (every day the tank is in operation (i.e., storing or treating hazardous waste):*

- ◆ Above ground portions of the tank including areas around the tank
  - Erosion or signs of releases of hazardous waste
- ◆ Secondary containment and area around the tanks
  - Free of cracks and gaps
  - Spilled liquid waste or accumulated precipitation must be removed from the secondary containment system within 24 hours of detection in accordance with 40 CFR 264.193.
    - If spilled or leaked waste and accumulated precipitation cannot be removed from the secondary containment system within 24 hours, MDWTP will demonstrate to the DEQ that removal of the released waste or accumulated precipitation cannot be accomplished within 24 hours. (40 CFR 264.193(c)(4))
- ◆ Leak detection system
  - Check tanks A-H to detect the failure of the primary and secondary structure.
    - If the leak detection system fails to detect the failure of the primary containment structure or the presence of any release within 24 hours, MDWTP will demonstrate to MDEQ that existing detection technologies or site conditions will not allow the detection of a release within 24 hours. (40 CFR 264.193(c)(3))
- ◆ Ancillary equipment without secondary containment
  - Equipment ancillary to Silos 1-6 will be inspected daily when hazardous waste is present in the tanks and the equipment is used. All other tank system ancillary equipment is in secondary containment.

*Monthly (if tank is not used in the month inspection will be completed prior to the next use)*

- ◆ Overfill controls
  - Ensure overfill controls are properly functioning.

All tanks and ancillary equipment that must have secondary containment systems meet the requirements of 40 CFR 264.193. As a result, leak and fit testing of tanks and ancillary equipment will occur following the replacement or repair of the tank system.

The control vent system and control device used for Subpart CC compliance meet the inspection requirements outlined in the facility Renewable Operating Permit.

### ***Emergency Equipment***

In accordance with the requirements set forth in 40 CFR 264.33 emergency equipment will be inspected monthly as follows:

- ◆ Fire extinguishing equipment
  - Completed and documented in accordance with MIOSHA inspection requirements found in R 408.10835.
- ◆ Spill control equipment
  - Present in sufficient quantities
- ◆ Decontamination Equipment
  - Operational

### **A5.B REMEDY SCHEDULE**

[R 299.9605 and 40 CFR §264.15(c)]

The operator remedies any deterioration/malfunction of equipment or structures, which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action is taken immediately.

If an unacceptable condition is detected, it is reported to the facility manager in charge at that time. The facility manager assigns responsibility for corrective action and a deadline by which corrective action has to be taken on the condition.

On subsequent daily inspections, the inspector monitors the condition until the situation is completely rectified. Once it is rectified, the date and time that the correction was made is noted on the first and last inspection forms that note the problem.

### **A5.C INSPECTION LOG OR SUMMARY**

[R 299.9605 and 40 CFR §264.15(d)]

Inspection records are maintained onsite at the facility as part of the operating record. These records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. These records are kept for at least three years from the date of inspection. (40 CFR 264.73(b)(5)

The attached inspection report forms are used to comply with the requirements of this attachment.

**MDWTP HW DAILY INSPECTION  
MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS**

Date/Time:  
Inspector:

DESCRIPTION	ACCEPTABLE YES	CORRECTIVE ACTION	INITIALS	DATE COMPLETED
<b>Communications System Available</b>				
<b>West Bay - Integrity &amp; Tanks (A, B, C, D)</b>				
Tank Spills or Leaks -- None				
Tank Secondary containment - Verify no liquids present.				
Walls, Doors, Floors, Roofs -- Integrity				
Trenches -- Empty (see definition of Empty* on back)				
<b>East Bay - Integrity &amp; Tanks (E, F, G, H)</b>				
Tank Spills or Leaks -- None				
Tank Secondary containment - Verify no liquids present.				
Walls, Doors, Floors, Roofs -- Integrity				
<b>NCSA Line/Waste Storage Silos (1-6)</b>				
Rotary Feeder Spills or Leaks -- None				
Spills or Leaks -- None				
Operational -- Fitness				
Screw Conveyor Leaks -- None				
<b>Tank Storage Farm (Vertical 16-19, 21,25) &amp; Aboveground Piping</b>				
Spills -- None				
Leaks -- None				
Trenches -- Empty (See definition of Empty* on the back)				
Secondary containment Walls & Floor -- Integrity				
<b>Pump Room</b>				
Spills or Leaks -- None				
<b>NCSA</b>				
Spills -- None				
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.				
Adequate Aisle Space				
Trenches -- Empty (See definition of Empty* on the back)				
Pads -- Integrity				
<b>ECSA</b>				
Spills -- None				
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.				
Adequate Aisle Space				
Trenches -- Empty (See definition of Empty* on the back)				
Pads -- Integrity				
<b>SECSA</b>				
Spills -- None				
Containers not damaged or deteriorating. Labels Complete & Readable. No leaks and lids are closed.				
Adequate Aisle Space				
Trenches -- Empty (See definition of Empty* on the back)				
Pads -- Integrity				
<b>Truck Dock</b>				
Spills - None				

## INSPECTION CRITERIA

### Treatment Bays/Tanks

Verify that there are no spills. Verify that there are no leaks.

Inspect walls, doors, floors, and roofs for signs of deterioration or damage. Verify that there are no leaks or cracks.

Inspect tracks on large doors to assure proper sliding and closing.

### Lime/Waste Storage Silos 1-6

Verify that there are no spills. Verify that there are no leaks. Inspect silos for any signs of deterioration or damage.

### Storage Tanks (Vertical 16-19, 21,25) & Aboveground Piping

Verify that there are no spills. Verify that there are no leaks.

Inspect impoundment walls and floor for leaks, cracks or accumulation of liquids.

### Pump Room

Verify that there are no spills. Verify that there are no leaks.

### Container Storage Areas

Verify that there are no spills. Inspect for leaks or cracks in dikes and the concrete or asphalt base.

Verify that labels are complete and readable.

Verify adequate aisle space to fit emergency equipment is available.

Verify that the containers are closed (lids and bungs on securely) excepts when necessary to add or remove waste.

Verify that the number of containers meet permit restrictions as follows

1.SPCSA 181,800 gallons of hazardous liquid waste or 946 cubic yards of solid hazardous waste.

2.NCSA and ECSA may not exceed a combined total of 124,000 gallons or 2,255 55 gallon container equivalents.

3.East and West Treatment Bays 5,500 gallons or 100, 55-gallon container equivalents of untreated waste in containers, outside the waste treatment tanks. Each bay may also store 250 cubic yards of treated waste outside of the waste treatment tanks.

Verify that trenches and sumps are empty\*. Ascertain that the integrity of the containment system is satisfactory.

\*Trenches and sumps are "empty" if all wastes have been removed that can be removed using the practices commonly employed to remove material from trenches and sumps.

Verify that no containers show signs of deterioration or leaking.

**MDWTP Non-Operating Day Inspection**  
**MONITORING, OPERATIONAL, AND STRUCTURAL SYSTEMS**

Date/Time:  
Inspector:

DESCRIPTION	CORRECTIVE ACTION		Initials	Date Completed
	Acceptable Yes	No		
<b>West Bay - Integrity &amp; Tanks (A, B, C, D)</b>  Tank Spills or Leaks -- None Tank Secondary containment - Verify no liquids present. Walls, Doors, Floors, Roofs -- Integrity				
<b>East Bay - Integrity &amp; Tanks (E, F, G, H)</b>  Tank Spills or Leaks -- None Tank Secondary containment - Verify no liquids present. Walls, Doors, Floors, Roofs -- Integrity				
<b>NCSA Lime/Waste Storage Silos (1-6)</b>  Spills or Leaks -- None				
<b>Tank Storage Farm (Vertical 16-19, 21,25) &amp; Aboveground Piping</b>  Spills or Leaks -- None Secondary containment Walls & Floor - Integrity				

**INSPECTION CRITERIA**

**Treatment Bays/Tanks**

Verify that there are no spills. Verify that there are no leaks.

Inspect walls, doors, floors, and roofs for signs of deterioration or damage. Verify that there are no leaks or cracks.

Inspect tracks on large doors to assure proper sliding and closing.

**Lime/Waste Storage Silos 1-6**

Verify that there are no spills. Verify that there are no leaks. Inspect silos for any signs of deterioration or damage.

**Storage Tanks (Vertical 16-19, 21,25) & Aboveground Piping**

Verify that there are no spills. Verify that there are no leaks.

Inspect impoundment walls and floor for leaks, cracks or accumulation of liquids.

## MDWTP HW Monthly

Date/Time:  
Inspector:

DESCRIPTION	Acceptable		Corrective Actions	Initials	Date Completed
	Yes	No			
<b>I. Fire Extinguishing Systems</b>					
Fire Extinguishers (11)					
In-Tank Foam System (1)					
<b>II. Spill Control Equipment</b>					
Drain Block					
Housekeeping equipment					
Absorbents					
<b>III. Vertical Tanks (16, 17, 18, 19, 23, 25, Silos 1-6)</b>					
Vents - Emergency Relief					
Overfill control					
<b>IV. Decontamination Equipment</b>					
Showers & Eyewash					

## EQUIPMENT CAPABILITIES & INSPECTION CRITERIA

### I. Fire Extinguishing Systems

Verify that units are at the locations and in the quantities indicated in this inspection report to enable quick access to equipment for fire suppression.  
 Inspect to determine that all units are maintaining adequate discharge pressure to ensure effective fire suppression.  
 Verify that maintenance/service contract(s) are being fulfilled by vendor.

Verify In-Tank foam generating system is charged with foaming solution and has water pressure.

### II. Spill Control Equipment

Verify that drain covers to block drains and provide containment of spilled materials are available  
 Verify heavy equipment used to clean spilled material is functional. Example includes heavy equipment with bucket.  
 Verify absorbent is available to soak up spilled, contained material.

### Storage Tanks (Vertical 16-19, 21, 25, Silos 1-6) & Aboveground Piping

Emergency Relief/Vents  
 Overfill level indicator functional

### IV. Decontamination Equipment

Record weekly check that Showers and Eyewashes are working with a mark on the inspection week to indicate "OK" on the day inspected.  
 Verify that showers and eyewash are covered properly to provide a clean supply of water to rinse body parts affected by chemicals.  
 Verify that all areas/equipment are operational to provide water to rinse chemicals from equipment.